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15 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
16 and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,
21 Plaintiff,
22 v.
23 UBER TECHNOLOGIES, INC.,
24 OTTOMOTTO LLC; OTTO TRUCKING LLC,
25 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF THEIR RESPONSE
TO WAYMO'S PRECIS LETTER
REQUESTING PERMISSION TO
FILE MOTION FOR SUMMARY
JUDGMENT AND EXHIBITS
THERE TO**

I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendants' Administrative Motion to File Under Seal Portions of Their Response to Waymo's Precise Letter Requesting Permission to File Motion for Summary Judgment and Exhibits Thereto.

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Response to Waymo's Precise Letter Requesting Permission to File Motion for Summary Judgment ("Response")	Highlighted Portions	Green (Plaintiff)
Exhibits 1-9	Entirety	Plaintiff
Exhibit 10	Entirety	Defendants

3. The entirety of Exhibit 10 contains highly confidential concerning Uber's costs and investments, including potential costs. This information has been maintained as confidential by Uber. Disclosure of this information would allow competitors of Uber to understand Uber's expenditures and potential expenditures, such that competitors could tailor their costs and investment strategy and Uber's competitive standing would be harmed.

4. The green-highlighted portions of the Response and the entirety of Exhibits 1 to 9 contain information that has been designated "Highly Confidential – Attorneys' Eyes Only" by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order ("Protective Order"), which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective Order.

/s/ Michelle Yang

YANG DECLARATION ISO DEFENDANTS' ADMINISTRATIVE MOTION TO FILE UNDER SEAL
Case No. 3:17-cv-00939-WHA
pa-1799641

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: August 24, 2017

/s/ Arturo J. González

ARTURO J. GONZÁLEZ